

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE: ZELIS REPRICING ANTITRUST
LITIGATION

Lead Action Case No.: 1:25-cv-10734-BEM

This Document Relates To:

Consolidated with Case Nos.:

All Associated Cases

1:25-CV-11092-BEM

1:25-CV-11167-BEM

1:25-cv-11537-BEM

**DEFENDANT UNITEDHEALTH GROUP INC.'S MOTION TO COMPEL
ARBITRATION WITH RESPECT TO DR. DENNIS C. AYER, PACIFIC INPATIENT
MEDICAL GROUP, INC. AND FRANK SCACCIA**

Defendant UnitedHealth Group Inc. ("United") respectfully moves this Court, pursuant to the Federal Arbitration Act ("FAA") (9 U.S.C. § 1 et seq.), for an order compelling the individual arbitration of claims asserted in the Amended and Consolidated Class Action Complaint ("Consolidated Complaint"), dated June 11, 2025 (ECF No. 39), against United by Plaintiff Dennis C. Ayer, DDS, LLC, Pacific Inpatient Medical Group, Inc. and Frank Scaccia, M.D., F.A.C.S., L.L.C. and staying their actions against United until any arbitration is resolved. The grounds for this Motion are set forth in the accompanying Memorandum in Support and Declaration thereto.

Dated: August 11, 2025

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Rachel S. Brass

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LOCAL RULE 7.1 CERTIFICATE

Pursuant to Local Rule 7.1(a)(2), the undersigned counsel certifies that counsel for Defendants have conferred with counsel for Plaintiffs and have attempted in good faith to resolve or narrow the issues in this Motion but have been unable to do so.

/s/ Rachel S. Brass

Rachel S. Brass

CERTIFICATE OF SERVICE

I hereby certify that, on this 11th day of August, 2025, the foregoing was filed with the Court's electronic filing system, which will send electronic notice of this filing to all counsel of record.

/s/ Rachel S. Brass

Rachel S. Brass